

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**IN RE:  
BLUE CROSS BLUE SHIELD  
ANTITRUST LITIGATION  
(MDL NO. 2406)**

**Master File No. 2:13-CV-20000-RDP**

**This Document Relates to  
Provider Track Cases**

**PROVIDER PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF  
PROPOSED CLASS SETTLEMENT**

The Provider Class Representatives<sup>1</sup> (on behalf of themselves and the Settlement Class) (“Provider Plaintiffs”) move this Court for an order preliminarily approving the proposed class settlement of the Provider Plaintiffs’ claims against the Settling Defendants, finding that the Settlement Classes are likely to be certified at final approval, appointing Provider Co-Lead Counsel, preliminarily approving the Plan of Distribution, setting a Final Approval Hearing, and making other rulings as set forth in the attached Memorandum of Law and Proposed Order.

In support of this Motion, Provider Plaintiffs submit herewith Memorandum of Law, along with the Settlement Agreement as Exhibit A; Declaration of Provider Co-Lead Counsel Joe R. Whatley, Jr. and Edith M. Kallas as Exhibit B; Declaration of Kenneth R. Feinberg and Camille S. Biros as Exhibit C; Declaration of Samuel Issacharoff as Exhibit D; the Affidavit of Settlement Administrator Edgar C. Gentle as Exhibit E; and proposed orders granting preliminary and final approval of the settlement. This Motion is also supported by Provider Plaintiffs’ Motion for Approval of a Plan for Notice and Appointment of Settlement Claims Administrator and Settlement Administrator, Memorandum of Law in support, and attached exhibits.

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning given them in the attached Settlement Agreement.

For the reasons set forth in these materials, the Provider Plaintiffs' Motion should be granted, and the Court should enter a Preliminary Approval Order in the form proposed.

Respectfully submitted this the 14th day of October, 2024.

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